

M/D 1

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

2007 JUN 29 A 10:12

NATHANIEL SHAW
 Full name and prison name of
 Plaintiff(s)

DEBRA P. HACKETT, CLERK
 U.S. DISTRICT COURT
 MIDDLE DISTRICT ALA.

v.

D.T. MARSHALL
ART BAYLOR
C.J. COUGHLIN
GINA SAVAGE
DR. BATES

) CIVIL ACTION NO. 2:07CV606-1D
 (To be supplied by Clerk of U.S. District
 Court)

Name of person(s) who violated your
 constitutional rights. (List the names
 of all the person.)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES NO

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES NO

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff (s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county)

2007 JUN 29 A 10:12
 THIS FORM MUST BE FILED WITH THE CLERK OF THE COURT OR THE CLERK'S ASSISTANT AS DIRECTED
 ON THE FORM. IT IS NOT A PETITION FOR A WRIT OF HABEAS CORPUS. IT IS A PETITION FOR A WRIT OF HABEAS CORPUS.

WITNESS: _____
 I declare under penalty of perjury that the foregoing is true and correct.

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT MONTGOMERY COUNTY DETENTION FACILITY P.O. BOX 4549 MONTGOMERY, AL 36103
 PLACE OR INSTITUTION WHERE INCIDENT OCCURRED MONTGOMERY COUNTY POLICE DEPARTMENT DETECTIVE DIVISION AND PUBlix GROCERY STORE LOT.
 III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
1. <u>SHERIFF D.T. MARSHALL MONTGOMERY COUNTY POLICE DEPT.</u>	
2. <u>ART BAYLOR CHIEF OF POLICE MONTGOMERY POLICE DEPT.</u>	
3. <u>SGT. C.J. COUGHLIN #1008 320 N. RIDLEY STREET MONTGOMERY, AL. 36004</u>	
4. <u>GINA SAVAGE JAIL ADMINISTRATOR MONTGOMERY COUNTY DETENTION FACILITY</u>	
5. <u>DOCTOR BATES DOCTOR MONTGOMERY COUNTY DETENTION FACILITY</u>	
6. _____	

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED MAY 9, 2007
AND ON GOING AS OF THIS 25TH DAY OF JUNE

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: POLICE ABUSE

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

PLAINTIFF LEFT SIDE OF FACE WAS
MAULED INTO THE HOT HOOD OF DEFENDANT'S
TRUCK CAUSING PLAINTIFF TO BE NEARLY
BLIND IN PLAINTIFF LEFT EYE DUE TO
THE NEGLIGENCE OF THE MCDF MEDICAL STAFF
GROUND TWO: DENIAL OF ACCESS TO THE COURT

SUPPORTING FACTS: ON MAY 27, 2007 PLAINTIFF
GAVE THE ORIGINAL OF THIS VERY COMPLAINT
TO OFFICER SMITH TO BE MAILED TO THE
COURT HOWEVER, NO ONE IN THE CLERK
OFFICE SEEM TO HAVE RECEIVED IT.
PLEASE COPY ATTACHED (EXHIBIT A).

GROUND THREE: CRUEL AND UNUSUAL PUNISHMENT

SUPPORTING FACTS: PLAINTIFF BEING HOUSED IN A
FACILITY THAT HAS LITTLE OR NO VENTILATION.
THAT IS INFESTED WITH SPIDERS THAT ARE
BITING INMATES. DENIAL OF RECREATION
BUT ONCE A MONTH. DENIAL OF MEDICAL
TREATMENT WHERE PLAINTIFF IS NEARLY TOTAL
BLIND IN LEFT EYE AND ALL DOCTOR BATES
HAS DONE IS DILATED PLAINTIFF EYE.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

PLAINTIFF REQUEST THAT A FULL SCALE INVESTIGATION OF THE MONTGOMERY POLICE DEPARTMENT ARREST PROCEDURE AND THE TAKING OF PROPERTY. PLAINTIFF REQUEST THAT AN FULL SCALE INVESTIGATION AND AN AUDIT BE HELD TO SEE WHERE (SEE ATTACHED)

Danthaniel Shaw
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6-25-2007
(Date)

Danthaniel Shaw
Signature of plaintiff(s)

CONTINUATION OF VI
THE FEDERAL FUNDS ARE BEING
SPENT PER EACH INMATE DAILY.
PLAINTIFF REQUEST THAT HE BE
MOVED TO A FEDERAL HOLDING
FACILITY DURING THE PENDENCY OF
THIS COMPLAINT. PLAINTIFF REQUEST
THAT THE COURT WILL ORDER THE
DEFENDANTS NOT TO HARRASS THE
PLAINTIFF OR PLACE PLAINTIFF IN
THREATENING POSITIONS. PLAINTIFF
REQUEST THAT THE COURT ORDER
THE DEFENDANTS TO PROVIDE PLAINTIFF
WITH FULL MEDICAL TREATMENT TO
SAVE THE VISION IN HIS LEFT EYE OR
SINCE PLAINTIFF IS A 100% SERVICE
CONNECT DISABLE VETERAN THAT
HE BE TAKEN TO A V.A. MEDICAL
FACILITY FOR TREATMENT. PLAINTIFF
IS TRULY IN FEAR OF HIS SAFETY
AT THE MONTGOMERY DETENTION
FACILITY AND REQUEST TO BE
MOVED TO A FEDERAL HOLDING FACILITY.
PLEASE COMPLAINT THAT WAS MAILED
AND CAN BE WITNESSED BY OTHER
INMATES IT WAS MAILED BUT APPEAR
TO HAVE NEVER REACHED THE COURT.
PLAINTIFF FEEL THREATENED BY THIS
ALONE, THE STOPPING OF U.S. MAIL.

PLAINTIFF REQUEST THE COURT
TO ORDER EACH DEFENDANT TO
PAY PLAINTIFF \$75,000.00 EACH
IN PUNITIVE DAMAGES AND \$50,000.00
FOR PAIN AND MENTAL ANGUISH SUFFERED.

PLEASE SEE (EXHIBIT "A")
COPY OF COMPLAINT FORWARD
IN SEPERATE LETTER

Montgomery, Alabama

BOOKS TO PRISONERS

P.O. Box 4599

Montgomery, Al.

36103



USA 41

Office of the Clerk

Montgomery District Court

P.O. Box 711

INMATE MAIL
MONTGOMERY, ALABAMA
36101-0711